

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOHN WILSON,

Plaintiff,

- against -

FEDERAL BUREAU OF INVESTIGATION,

Defendant.

20 Civ. 10324 (LAK) (SDA)

**PLEASE TAKE NOTICE** that upon the declaration of Katherine “Q” Adams of Beldock Levine & Hoffman, LLP, sworn to on November 15, 2021 and the accompanying Memorandum of Law, the undersigned will request this Court located at 500 Pearl Street, New York, NY 10007 at a time of the Court’s convenience for an:


1. Order denying Defendant’s Fed. R. Civ. P. 56 (a) motion for summary judgment and granting Plaintiff’s cross-motion for summary judgment;
2. Order granting *in camera* review of seven pages of improperly withheld documents;
3. Order requiring Defendant to conduct additional searches for records responsive to Plaintiff’s FOIA request;
4. Order granting Plaintiff’s attorneys’ fees and costs; and
5. Other such relief as the Court finds just and proper.

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Dated: November 15, 2021  
New York, New York

Respectfully submitted,

BELDOCK LEVINE & HOFFMAN, LLP  
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New York, New York 10016  
*Attorneys for Plaintiff*

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